

ATTACHMENT A

Remarks

By this Amendment, numerous clarifying corrections have been made in the specification. In the claims, independent claim 1 has been rewritten as new independent claim 5 for clarity and to better define the invention; and likewise dependent claims 2-4 has been amended for clarity and to better define the invention as well as for better consistency with independent claim 5. It is submitted that the present application is in condition for allowance for the following reasons.

Initially in the *Specification* section of the Detailed Action, the disclosure was objected for a few informalities, and in general for being a literal translation replete with confusing language. By this Amendment, the noted problems, as well as other confusing passages, have been amended for better clarity as requested by the examiner.

In the *Claim Objections* section, it was suggested that the reference numbers be removed from claims 1-4. By this Amendment, this has been done.

In the *Claim Rejections – 35 USC § 112* section , claims 1-4 were rejected under 35 USC § 112 for being indefinite. By this Amendment, these claims have been substantially rewritten to overcome the noted problems as well as others of a similar nature as requested.

Finally, in the *Claim Rejections - 35 USC § 102* section, independent claim 1 and dependent claims 2-4 were all rejected under 35 USC § 102 as being anticipated by the Kordes patent and by the Buck patent. However, for the following reasons, it is

submitted that new independent claim 5 and dependent claims 2-4 are allowable over each of these references.

In independent claim 5, it is specifically claimed that the base pin (11) of the foot bolt is designed to be manually pushed down into the hole in the base (e.g., floor). This is accomplished by providing a bracket (13) which is connected to the base pin (see figure 5). With this construction, the preceding element is maneuvered into position so that the base pin is above the hole in the base, and then the user pushes the base pin into the base hole by engaging his foot (or the like) with the bracket and moving the bracket to a downwards position. This action locks the base pin in the base hole as the locking/release pin (12) acts to lock the base pin in this downward and engaging position - which is the first locking position of the locking/release pin.

Thereafter, when a next element is moved into position next to the preceding element, the preceding element is already locked in place. This makes it easy to bring the next element into position, so that the down-located bracket is received in a counter hole (9) of the next element; which thus locks the next element against sideways movement to the preceding element. In addition, as the next element is brought into position, the next element engages the locking/release pin of the preceding element, moving it from the first locking position to a second releasing position where the base pin is no longer prevented from moving up and hence out of the base hole by the locking/release pin. However, it will be appreciated that the base pin cannot move up and out of the base hole at this time because the down-located bracket connected to the base pin cannot move upwards due to its receipt in the counter hole of the next element. Thus, at this time, both elements are locked together against sideways

movement (and the next element is ready to be easily locked with its base pin on its other side).

In order to unlock the next element, it is simply moved away from the preceding element, withdrawing the bracket from the counter hole. Once the bracket is released, it no longer holds the base pin in the base hole so that a member (e.g., spring) moves the base pin out of the base hole and the bracket upwards. This releases the preceding element, which can then be removed in the same manner from a further preceding elements, etc.

The various components noted above with the noted functions are now particularly claimed in claim 5.

The **Kordes patent** discloses a wall partition system in which a next wall and a preceding wall are locked together. An automatic locking is accomplished by bringing the two walls together. However, it will be appreciated that prior to engagement of the next wall with the preceding wall, the base locking bolt 21 is not located in the hole in the base, which can make engagement difficult since the preceding wall must be initially positioned and then held against sideways movement during this engagement to assure that the base locking bolt 21 is located over the hole in the base. This is a disadvantage of this system, and one which the present invention does not suffer since the base pin is initially locked into the base hole by pushing the bracket down before next element is brought into engagement.

It will thus be appreciated that the Kordes patent does not have an equivalent bracket: which effects a downward movement, which downward movement is necessary to locate the bracket to be received in a counter hole of a next element;

which is locked in the down position by engagement with the counter hole and hence prevented from upwards movement; and which, upon movement of the next element away from the preceding element, is free to move upwards by being released from the counter hole. In addition, the Kordes patent does not have an equivalent locking releasing pin which: in a first locking position, locks the base pin down in the hole with the bracket thus located in the down position; and in a second releasing position, when the next element is brought close by the preceding element and pushes the locking/releasing pin inwardly, releases the base pin from being locked down in the hole even while the bracket which is in the down position and which is received in the counter hole prevents the base pin from moving upwards.

Therefore, for all of the foregoing reasons, it is submitted that new independent claim 5 is neither disclosed nor made obvious by the Kordes patent. For these same reasons, it is submitted that claims 2-4 dependent therefrom are likewise allowable. In addition, it is now made clear that the individual elements particularly claimed in the dependent claims have no equivalent disclosure in the Kordes patent so that these claims are additionally allowable based on their own recitations.

The **Buck patent** discloses a security lock means for sliding doors or the like which are confined to run in tracks so that sideways movements are not a concern. The lock means 20 includes a lock bolt 58 which is mounted to a first door. Lock bolt 58 is actuated to a locked position by pressing against a spring-biased actuator member 45 to move the lock bolt 58 perpendicular to the plane of the door when the second door is in the closed or locking position relative to the first door. This movement of lock bolt 58 causes it to be received inside of an opening 99 in a tongue 97 attached to the second

door. Upon being moved into the locking position, a release member 73 is spring actuated to hold the lock bolt 58 in the locked position. However, when release member 73 is pressed by the user, it moves to a position where the lock bolt is free to resiliently move out of the locking position.

It will thus be appreciated that the Buck patent also does not have an equivalent bracket: which effects a downward movement, which downward movement is necessary to locate the bracket to be received in a counter hole of a next element; which is locked in the down position by engagement with the counter hole and hence prevented from upwards movement; and which, upon movement of the next element away from the preceding element, is free to move upwards by being released from the counter hole. In addition, the Buck patent does not have an equivalent locking releasing pin which: in a first locking position, locks the base pin down in the hole, with the bracket thus located in the down position; and in a second releasing position, when the next element is brought close by the preceding element and pushes the locking/releasing pin inwardly, releases the base pin from being locked down in the hole even while the bracket which is in the down position and which is received in the counter hole prevents the base pin from moving upwards.

Therefore, for all of the foregoing reasons, it is submitted that new independent claim 5 is neither disclosed nor made obvious by the Buck patent. For these same reasons, it is submitted that claims 2-4 dependent therefrom are likewise allowable. In addition, it is now made clear that the individual elements as particularly claimed in the dependent claims have no equivalent disclosure in the Buck patent so that these claims are additionally allowable based on their own recitations.

For all of the foregoing reasons, it is submitted that the present application is in condition for allowance and such action is solicited.